

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

**JESUS R. SANCHEZ, on behalf of himself
and all others similarly situated,**

Plaintiff,

vs.

VERIFIED PERSON, INC., et al,

Defendants.

CASE NO. 2:11-cv-02548

DISTRICT JUDGE S. THOMAS
ANDERSON

MAGISTRATE JUDGE CHARMIANE
G. CLAXTON

**PLAINTIFF'S UNOPPOSED MOTION FOR AN EXTENSION OF TIME
TO RESPOND TO DEFENDANT'S
EBACKGROUNDCHECKS.COM'S MOTION TO DISMISS**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Plaintiff, Jesus Sanchez, hereby moves the Court for an extension of time up to and including May 14, 2012 in which to respond to Defendant, e-BackgroundChecks.com's ("BGC"), Motion to Dismiss for Failure to State a Claim Upon Which Relief Can Be Granted (DN #42) ("Motion").

Plaintiff seeks additional time to provide a thorough and appropriate response to the Motion. No prior extensions to respond to the Motion have been requested. Accordingly, Plaintiff requests an additional seven (7) days – up to and including May 14, 2012 – to respond to the Motion.

WHEREFORE, Plaintiff respectfully requests the entry of an Order extending his time up through and including May 14, 2012 to respond to BGC's Motion to Dismiss for Failure to State a Claim upon Which Relief Can Be Granted. A proposed Order is submitted herewith pursuant to the Local Rules.

LOCAL RULE 7.2(a)(1)(B) CERTIFICATION

Undersigned counsel hereby certifies that he conferred with John Jett, counsel for BGC, via email on May 2, 2012 and is authorized to represent that BGC does not oppose the relief requested.

Respectfully submitted,

STUMPHAUZER, O'TOOLE, McLAUGHLIN,
McGLAMERY & LOUGHMAN CO., LPA

By: /s/ Matthew A. Dooley
Matthew A. Dooley, Esq.
Anthony R. Pecora, Esq.
Dennis M. O'Toole, Esq.
5455 Detroit Road
Sheffield Village, Ohio 44054
Telephone: (440) 930-4001
Facsimile: (440) 934-7208
Email: dotoole@sheffieldlaw.com
apecora@sheffieldlaw.com
mdooley@sheffieldlaw.com
Counsel for Jesus Sanchez and the putative class

CERTIFICATE OF SERVICE

I certify that on May 4, 2012, I electronically filed Plaintiff's Unopposed Motion for an Extension of Time to Respond to Defendant, e-BackgroundChecks.com's Motion to Dismiss for Failure to State a Claim upon Which Relief Can Be Granted with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to all counsel and parties of record.

/s/ Matthew A. Dooley
*Counsel for Jesus Sanchez and the putative
class*